UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CIMONTUBO – TUBAGENS E SOLDADURA, LDA,

Plaintiff,

-against-

PETRÓLEOS DE VENEZUELA, S.A. and PDVSA PETRÓLEO, S.A.,

Defendants.

Docket No.: 1:20-cv-05382

NOTICE OF DEFENDANTS'
MOTION FOR RECONSIDERATION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion for Reconsideration, and all proceedings and pleadings in this action, Defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A., by and through their undersigned counsel, will move this Court, the United States District Court for the Southern District of New York, at the courthouse thereof, located at 500 Pearl Street, New York, New York 10007, before the Honorable George B. Daniels, for an order reconsidering the order granting plaintiff Cimontubo – Tubagens E Soldadura, LDA's summary judgment against Defendants and, upon reconsideration, deferring summary judgment until Defendants have completed discovery as to Novo Banco, and granting such other and further relief as the Court deems just and proper.

Dated: March 18, 2021

Respectfully submitted,

HOGAN LOVELLS US LLP

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